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FILED



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JAN 6 PM 3 00

THE MAGNAVOX COMPANY and  
SANDERS ASSOCIATES,

Plaintiffs,

v.

BALLY MANUFACTURING CORPORATION  
ET AL,

Defendants.

CONSOLIDATED CIVIL ACTIONS  
NOS. 74 C 1030 —  
74 C 2510

ANSWERS ON BEHALF OF DEFENDANT  
WORLD WIDE DISTRIBUTORS, INC.  
TO PLAINTIFFS' FIRST INTERROGATORIES  
(NOS. 1 THROUGH 47)

Defendant, World Wide Distributors, Inc., hereby answers Plaintiffs' first interrogatories Nos. 1 through 47 in accordance with Rule 33 of the Federal Rules of Civil Procedure.

Defendant, World Wide Distributors, Inc., hereinafter "World Wide", will respond to the interrogatories in the manner required by the rules. However, inasmuch as a number of these interrogatories are identical to those propounded to the "Seeburg" Defendants, it is believed (where such is the case) that it will be more convenient for the parties and the Court to refer to Seeburg's Answers to Plaintiffs' First Interrogatories and in so doing, simply state that the interrogatories and answers are the same with the understanding that the answer given is to be taken on behalf of World Wide as well as Seeburg. The alternative to this procedure is to reproduce both the interrogatory

and answer for each Defendant, a procedure which is believed to be more costly for all parties.

Interrogatories 1 through 12 propounded to Defendant World Wide are identical to interrogatories 1 through 12 propounded to the Seeburg Defendants. The answers given by the Seeburg Defendants are adopted on behalf of Defendant World Wide.

Interrogatory No. 13

13. Referring to defendant's response to Complaint paragraph 12, state fully and completely the basis for the denial that defendant World Wide has separately and independently or jointly with the other defendants or any one else infringed United States Letters Patent Nos. 3,659,284 and 3,659,285.

ANSWER: It is World Wide's position that it has never made, used or sold gaming apparatus which infringes the subject matter of the claims of Patent Nos. 3,659,284 and 3,659,285 as the law of patent infringement is interpreted by U. S. courts. Further, the Plaintiffs have not as yet advised World Wide of the claims it is charged to have infringed; therefore, it would be burdensome for World Wide to provide and study information with respect to 71 claims of the above-named patents. World Wide is prepared to supplement its response to this interrogatory when Plaintiffs advise it of which claims are charged to be infringed.

Interrogatory No. 14

14. Referring to defendant's response to Complaint paragraph 13, state fully and completely the basis for defendant's denial that defendant's infringements of said Letters Patent 3,659,284 and 3,659,285 were and are willful and with full knowledge of said Letters Patent.

ANSWER: See the answer to Interrogatory 13 above.

Interrogatory No. 15

15. Referring to paragraph 15 of defendant's answer, which states with reference to the patents in suit:

"World Wide denies that it has  
infringed United States Letters Patent  
Nos. 3,659,284 and 3,659,285."

State fully and completely the basis for defendant's denial that it has infringed United States Letters Patent 3,659,284 and 3,659,285.

ANSWER: See the answer to Interrogatory 13 above.

Interrogatory No. 16

16. Referring to paragraph 31 of the counterclaim of defendant, which states with reference to the patents in suit:

"Defendant-counterclaimant contends  
that it is not now nor has it ever infringed  
Letters Patent Nos. 3,659,284 and 3,659,285."

State fully and completely the basis for defendant's contention that it is not now nor has it ever infringed Letters Patent 3,659,284 and 3,659,285.

ANSWER: See the answer to Interrogatory 13 above.

Interrogatory No. 17

17. (a) Identify by type or model number each item, device, apparatus, manufacture, or equipment employing a cathode ray tube or a television receiver as an integral part thereof designed, assembled, produced, manufactured, imported, sold, or offered for sale by defendant.

(b) Identify by type or model number each item, device, apparatus, manufacture, or equipment designed or intended to operate with a cathode ray tube or a television receiver or operable with a cathode ray tube or a television receiver assembled, produced, manufactured, designed, imported, sold, or offered for sale by defendant; and

(c) Describe each item, device, apparatus, manufacture, or equipment (hereinafter collectively referred to as "models") identified in subparagraphs (a) and (b) above including generally the function, operation and major components of each.

ANSWER: 7/10

(a) Defendant has not designed, assembled, produced or manufactured any item, device, apparatus or equipment employing a cathode ray tube or television receiver as an integral part thereof. Defendant has sold or offered for sale the following games which fit the description of Interrogatory 17(a):

<u>Mfr.</u>	<u>Game</u>
Midway	Winner
Nutting	Space Ball
Ramtek	Volley
Chicago Coin	TV Tennis
Allied Leisure	Tennis Tourney
Kee	Spike
United	Sportarama
Ramtek	Soccer
Williams	Pro-Tennis
Williams	Pro-Hockey
Williams	Paddle Ball

Atiri	Pong
Midway	Leader
Ramtek	Hockey
Atiri	Gotcha
Kee	Elimination
Midway	Astroid

(b) The answer to 17(b) is the same as the answer to 17(a).

(c) A general description of the function of the games identified in 17(a) is as follows:

Winner is a TV tennis game; Volley is a TV tennis game; TV Tennis is a tennis game; Tennis Tourney is a TV tennis game; Sportarama is a combination tennis and related game; Space Ball is a 2-player TV tennis game; Ramtek is a 4-player TV soccer game; Pro-Tennis is a TV tennis game; Pro-Hockey is a TV hockey game; Pong is a 2-player TV tennis game; Paddle Ball is a TV tennis-type game; Leader is a TV game wherein players are eliminated; Hockey is a TV hockey game; Gotcha is a TV maze game; and Elimination is a TV game in which players are eliminated.

#### Interrogatory No. 18

18. Identify all documents including, but not limited to, instruction manuals, service sheets, circuit diagrams or

schematics, trade catalogs and the like, promotional materials, market surveys, market reports, customer surveys, mechanical drawings, sketches, engineering specifications and reports, design specifications, test specifications, test reports, design memoranda and procurement specifications relating to the structure, operation, performance and marketability of each of the models identified in response to interrogatory 17.

ANSWER: The identification requested in Interrogatory 18 has been provided along with a production of the identified documents by letter dated December 30, 1974 to Plaintiffs' counsel.

Interrogatory No. 19

19. Have any of the models identified in response to interrogatory 17 been manufactured and/or supplied in whole or in part by persons other than defendant? If so, identify:

(a) Each such manufacturer and/or supplier and the models identified in response to interrogatory 17 which each such manufacturer and/or supplier manufactures or supplies; and

(b) Specify the portion of each such model manufactured or supplied by each manufacturer or supplier.

ANSWER: Yes.

(a) Defendant does not manufacture any TV games and obtains all such games from the manufacturers or other suppliers. The manufacturer for each game or model identified in Interrogatory 17 is given in Interrogatory 17. As far as Defendant World Wide has knowledge, such games are manufactured in whole solely by the named manufacturers.

(b) Defendant World Wide does not know which portions of the models were manufactured by the named manufacturer or by others.

Interrogatory No. 20

20. With respect to each of the manufacturers and/or suppliers identified in response to interrogatory 19, identify:

(a) All documents, communications, and documents relating to communications between defendant and each such supplier and/or manufacturer in any way relating to Letters Patent 3,659,284 or 3,659,285; and

(b) All documents, communications, and documents relating to communications received or written by defendant, including, but not limited to, communications between defendant and each such manufacturer and/or supplier, relating to the construction, manufacture, sale and/or distribution of models identified in connection with the answer to interrogatory 17 and the avoidance of the subject matter claimed in either of said patents.

ANSWER:

(a) No documents, communications or documents relating to communications as called for in Interrogatory 20(a) exist to Defendant's knowledge.

(b) Same answer as 20(a).

Interrogatory No. 21

21. Identify all documents, communications, and documents relating to communications between defendant and any manufacturer, wholesaler, distributor, dealer or importer in connection with or relating to disputes, dispute settlements, agreements, disagreements, contract negotiation, licensing or any other controversy or controversy settlement in respect to infringement of, or encroachment upon, any rights in any way related to the models identified in connection with the answer to interrogatory 17.

ANSWER: Documents relating to the subject matter of this interrogatory may exist and, if so, will be collected in the near future. As soon as these documents are so collected, the answer to this interrogatory will be supplemented.



Interrogatory No. 22

22. (a) Identify any patents or patent applications in which defendant have any rights relating to any subject matter embodied in any of the models identified in response to interrogatory 17, both in the United States and elsewhere; and

(b) Identify any patent application filed by or on behalf of defendant, any patent applications proposed or prepared for filing by or on behalf of defendant and not filed, and any subject matters which were considered for possible patenting by or on behalf of defendant, both in the United States and elsewhere, and relating to any subject matter embodied in any of the models identified in response to interrogatory 17.

ANSWER: (a) None.

(b) None.

Interrogatory No. 23

23. Identify any interferences, opposition proceedings, or public use proceedings which involved any of the patents or patent applications identified in response to interrogatory 22.

ANSWER: None.

Interrogatory No. 24

24. Identify all patents or publications cited by any examiner or other official, whether applied or not, in any proceeding related to the patents or patent applications identified in response to interrogatory 22.

ANSWER: None.

Interrogatory No. 25

25. Identify any judicial proceedings in state or federal courts involving or relating to the subject matter, including circuits, circuit boards, apparatus and devices, embodied in any of the models identified in response to interrogatory 17, including, but not limited to, judicial proceedings in which the claims raised involved patent infringement, copyright infringement or unfair competition.

ANSWER: None.



Interrogatory No. 26

26. Identify all persons who designed, assisted in the design, procured or assisted in the procurement of all or any portion of the models identified in response to interrogatory 17, and specify the function of each such person in connection with each such model.

ANSWER: Fred M. Skor, Vice President of World Wide Distributors, Inc., 2732 West Fullerton Avenue, Chicago, Illinois 60647, procured or assisted in the procurement of all of the models identified in response to Interrogatory 17. His function with the company is vice president and he has the responsibility for purchase and sales of TV games.

Interrogatory No. 27

27. (a) Identify the date(s) when defendant first gained knowledge of patent 3,659,284 or of the application which resulted in said patent;

(b) Identify the date(s) when defendant first gained knowledge of patent 3,659,285 or of the application which resulted in said patent;

(c) Identify the date(s) when defendant first gained knowledge that plaintiffs individually or collectively were asserting exclusive or patent rights in the industry or trade related to any of the models identified in response to interrogatory 17;

(d) Identify the date(s) when defendant was first advised by or received notice from plaintiffs or representatives of plaintiffs that plaintiffs individually or collectively were asserting exclusive or patent rights relative to gaming apparatus employing or adapted to operate with a cathode ray tube or a television receiver;

(e) State in detail the manner in which defendant gained or received the knowledge, advice or notice specified in response to paragraphs (a) through (d) hereof and identify the person or persons, firm or firms, corporation or corporations and the like from whom such knowledge, advice or notice was gained or received; and

(f) Identify all documents relating to the knowledge, advice and notice referred to in subparagraphs (a) through (e) hereof.

ANSWER: (a) On the date the Complaint in the instant lawsuit was served on Defendant;

(b) On the date the Complaint in the instant lawsuit was served on Defendant;

(c) On the date the Complaint in the instant lawsuit was served on Defendant;

(d) On the date the Complaint in the instant lawsuit was served on Defendant;

(e) Notice was given by the service of the Complaint upon the Defendant by the U. S. Marshal; and

(f) The Complaint in the instant lawsuit.

Interrogatory No. 28

28. Identify each person whom defendant expects to call as an expert witness in this civil action and/or who has been retained or specially employed by defendant in anticipation of this civil action and/or in preparation for trial for this civil action.

(a) As to each expert witness, state the subject on which he is expected to testify;

(b) As to each expert witness, state the substance of the facts and opinions as to which the expert is expected to testify; and

(c) As to each expert witness, summarize the grounds for each opinion set forth in answer to subparagraph (b) hereof.

ANSWER: As of this date World Wide has not selected

an expert witness. If and when World Wide does select such a witness, Plaintiffs will be advised and the information sought in this interrogatory furnished.

Interrogatory No. 29

29. Have any novelty, patentability, state of the art, validity and/or infringement searches and/or investigations been conducted by the defendant relating to the subject matter described or claimed in United States Letters Patent 3,659,284 or United States Letters Patent 3,659,285? If so:

(a) State the date or dates of each such search and/or investigation;

(b) Identify all prior art located and/or noted as a result of each such search and/or investigation; and

(c) Identify all documents relating to each such search and/or investigation, including, but not limited to, summaries, notes, memoranda, opinions and the like prepared by employees or attorneys of defendant.

ANSWER: None.

Interrogatory No. 30

30. For each model identified in response to interrogatory 17, state, by year, the total number of units made, sold or offered for sale, the price charged, and the profit realized.

ANSWER: Objected to.

Interrogatory No. 31

31. With respect to the decision of defendant not to enter into a license agreement regarding United States Letters Patent 3,659,284 and 3,659,285:

(a) Identify all persons who participated in such decision;

(b) Identify all documents relating to such decision;

(c) State the date when such decision was made;

(d) State in detail the basis for such decision and identify all materials, documents and other considerations which were utilized or taken into account in reaching such decision; and

(e) Identify all materials and/or documents relating to any license negotiations between plaintiffs and the aforesaid defendant.

ANSWER: Defendant World Wide has not made a decision not to enter into a license agreement regarding U. S. Patent Nos. 3,659,284 and 3,659,285.

Interrogatory No. 32

32. Has defendant, any of its manufacturers, suppliers, distributors, customers and/or any user of the models identified in response to interrogatory 17 been notified other than by plaintiffs herein with respect to the existence of and/or the possibility of and/or the infringement of any United States Letters Patent relating to apparatus employing a cathode ray tube or a television receiver? If so, identify:

- (a) Each person notified;
- (b) Each such Letters Patent;
- (c) Each party who gave each such notice;
- (d) All documents relating to each such notice and/or to the disposition thereof; and
- (e) Any civil action involving an allegation that said apparatus was covered by and/or infringed the claims of a United States Letters Patent other than United States Patents 3,659,284 and 3,659,285.

ANSWER: No.

Interrogatory No. 33

33. Has defendant, any of its manufacturers, suppliers, distributors, customers and/or any user of the models identified in response to interrogatory 17 been offered by any party other than plaintiffs a license under any United States Patents relating to apparatus employing a cathode ray tube or a television receiver as an integral part thereof? If so, identify:

- (a) Each person notified;
- (b) Each such Letters Patent;

- (c) Each party who offered each such license;
- (d) The date of each such license offer;
- (e) The status and/or disposition of each such license offer; and
- (f) All documents relating to each such license offer and/or the disposition thereof.

ANSWER: No.

Interrogatory No. 34

34. Has defendant had any communications, whether oral or written, with parties other than plaintiffs regarding (i) the subject matter of United States Patents 3,659,284 and 3,659,285, (ii) the validity of United States Patents 3,659,284 and 3,659,285, (iii) plaintiff The Magnavox Company's charge to defendant or others of infringement of United States Patents 3,659,284 and 3,659,285, (iv) plaintiff The Magnavox Company's offer to defendant and others of a license under United States Patents 3,659,284 and 3,659,285, and/or (v) the construction of gaming apparatus employing a cathode ray tube or a television receiver and the avoidance of the claimed subject matter of United States Patents 3,659,284 and 3,659,285? If so, identify:

- (a) Each such other party; and
- (b) All documents, communications and documents relating to communications with each such other party.

ANSWER: Yes.

(a) Messrs. Sam Stern and Gary M. Stern,  
3401 North California, Chicago, Illinois.

(b) Documents relating to the subject matter of this interrogatory may exist and, if so, will be collected in the near future. As soon as these documents are so collected, the answer to this interrogatory will be supplemented.

Interrogatory No. 35

35. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"In combination with a standard television receiver, apparatus for generating signals representing a symbol to be displayed on the screen of said television receiver, comprising:

a control unit including means for generating horizontal and vertical signals representing the symbol to be displayed, means for synchronizing a television raster scan, and means for manipulating the position of the symbol on the screen, said manipulating means including means for generating first and second control signals coupled to said means for generating horizontal and vertical signals, said control signal generating means including means for causing the displayed symbol to travel back and forth between two predetermined positions offscreen; and

means for electrically coupling said control unit to said television receiver."

For those models identified in response to interrogatory 17 which do not include the entire combination of elements recited above, state with specificity which elements are not included in the respective models.

ANSWER: Defendant World Wide is engaged in the business of purchasing and selling games including games of the type involved in the present litigation. World Wide does not have a technical staff capable of designing, implementing, manufacturing or servicing the electronic elements of the games involved in this litigation. Therefore, it has no personnel capable of intelligently responding to this interrogatory which requires an understanding



of the electronic terminology provided and which apparently is abstracted from the claims of the patents in suit. For these reasons Defendant World Wide does not have sufficient knowledge to answer this interrogatory.

Interrogatory No. 36

36. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"In combination with a standard television receiver, apparatus for generating symbols upon the screen of the receiver to be manipulated by at least one participant, comprising:

means for generating a hitting symbol, and

means for generating a hit symbol including means for ascertaining coincidence between said hitting symbols and said hit symbol and means for imparting a distinct motion to said hit symbol upon coincidence."

For those models which do not include the entire combination above recited, state with specificity what elements of the combination are absent from the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 37

37. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"Apparatus for playing a baseball type game on the screen of a cathode ray tube comprising:

means for displaying a hit spot;

means for displaying a hitting spot;

means for adjusting the vertical position of said hitting spot;

means for serving said hit spot; and

means for varying the vertical position of said hit spot; and

means for denoting coincidence between said hit and said hitting spot whereby said hit spot will reverse directions."

For those models identified in response to interrogatory 17 which do not include the entire combination above recited, state with specificity what elements of the combination are absent from the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 38

38. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"Apparatus for playing a hockey type game upon the screen of a cathode ray tube, comprising:

means for displaying a first hitting spot;

means for displaying a second hitting spot;

means for displaying a hit spot;

means for controlling the position of said first and second hitting spots;

means for controlling the position of said hit spot including means for ascertaining coincidence between either of said hitting spots and said hit spot and means for imparting a distinct motion to said hit spot upon coincidence."

For those models identified in response to interrogatory 17 which do not include the entire combination above recited, state with specificity what elements of the combination are absent from the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 39

39. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"Apparatus for generating symbols upon the screen of a television receiver to be manipulated by at least one participant, comprising:

means for generating a hitting symbol; and

means for generating a hit symbol including means for ascertaining coincidence between said hitting symbol and said hit symbol and means for imparting a distinct motion to said hit symbol upon coincidence."

For those models identified in response to interrogatory 17 which do not include the entire combination above recited, state with specificity what elements of the combination are absent from the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 40

40. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"In combination with a standard television receiver, apparatus for generating signals representing a first and second hitting symbol and a hit symbol to be displayed on the screen of said television receiver, comprising:

means for generating sync signals;

means for generating a first sawtooth wave;

means for generating a second sawtooth wave;

a first hitting symbol generator;

a second hitting symbol generator;

a hit symbol generator;

means for applying said first and second sawtooth waves to said symbol generators;

means for generating first and second control signals for said first hitting symbol generator;

means for coupling said first and second control signals to said first hitting symbol generator;

means for generating third and fourth control signals for said second hitting symbol generator;

means for coupling said third and fourth control signals to said second hitting symbol generator;

means for generating fifth and sixth control signals for said hit symbol generator;

means for coupling said fifth and sixth control signals to said hit symbol generator;

means for coupling said first, second, third, and fourth control signals to said means for generating fifth and sixth control signals; and

means for coupling the outputs of said symbol generators and said sync signals to the television receiver."

For those models identified in response to interrogatory 17 which do not include the entire combination above recited, state with specificity what elements of the combination are absent from the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 41

41. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"Apparatus for generating symbols upon the screen of a cathode ray tube, comprising:

a cathode ray tube;

means for generating horizontal and vertical sync signals;

means for generating first and second sawtooth waves;

means for generating a video signal proportional to predetermined slices of said sawtooth waves including a first slicer having first and second diodes connected back-to-back with one junction thereof coupled to said vertical sawtooth generating means, a capacitor coupled from the other junction to ground and means for receiving a first control signal at said other junction, and first means for differentiating the output from said first slicer, and a second slicer having third and fourth diodes connected back-to-back with one junction thereof coupled to said horizontal sawtooth generating means, a capacitor coupled from the other junction to ground and means for receiving a second control signal at said other junction, and second means for differentiating the output from said second slicer, and a coincidence gate coupled to said first and second differentials;

a horizontal deflection circuit coupled to said cathode ray tube;

a vertical deflection coupled to said cathode ray tube circuit;

means for coupling said video signal to the intensity input of said cathode ray tube;

means for coupling said horizontal sync signals to said horizontal deflection circuits; and

means for coupling said vertical sync signals to said vertical deflection circuit."

For those models identified in response to interrogatory 17 which do not include the entire combination recited above, state with specificity which elements are absent from the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 42

42. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"In combination with a standard television receiver, apparatus for generating signals representing a first and second 'hitting' symbol and a 'hit' symbol to be displayed on the screen of said television receiver, comprising:

means for generating horizontal and vertical sync signals;

means for generating a vertical train of square pulses;

means for generating a horizontal train of square pulses;

a first 'hitting' symbol generator;

a second 'hitting' symbol generator;

a 'hit' symbol generator;



means for applying said vertical and horizontal trains of square pulses to said symbol generators;

means for generating first and second control signals for said first 'hitting' symbol generator;

means for coupling said first and second control signals to said first 'hitting' symbol generator;

means for generating third and fourth control signals for said second 'hitting' symbol generator;

means for coupling said third and fourth control signals to said second 'hitting' symbol generator;

means for generating fifth and sixth control signals for said 'hit' symbol generator;

means for coupling said fifth and sixth control signal to said 'hitting' symbol generator;

means for coupling said first, second, third and fourth control signals to said means for generating fifth and sixth control signals; and

means for coupling the outputs of said symbol generators and said sync signals to the television receiver."

For those models identified in response to interrogatory 17 which do not include the entire combination of elements recited above, state which elements are absent from the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 43

43. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"In combination with a standard television receiver, apparatus for generating symbols upon the screen of the receiver to be manipulated by at least one participant, comprising:

means for generating a 'hitting' symbol;

means for generating a movable 'hit' symbol;

means for generating a fixed 'hit' symbol;

means for denoting coincidence between said movable 'hit' symbol and said 'hit' fixed symbol;

means for causing said movable 'hit' symbol to move away from said fixed 'hit' symbol when coincident therewith; and

means for displaying said symbols."

For those models identified in response to interrogatory 17 which do not include the entire combination of elements recited above, state with specificity which elements are not included in the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 44

44. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"Apparatus for generating signals representing a first and second 'hitting' symbol and a 'hit' symbol to be displayed on the screen of a television receiver, comprising:

means for generating horizontal and vertical sync signals;

means for generating a vertical train of square pulses;

means for generating a horizontal train of square pulses;

a first 'hitting' symbol generator;

a second 'hitting' symbol generator;

a 'hit' symbol generator;

means for applying said vertical and horizontal trains of square pulses to said symbol generators;

means for generating first and second control signals for said first 'hitting' symbol generator;

means for coupling said first and second control signals to said first 'hitting' symbol generator;

means for generating third and fourth control signals for said second 'hitting' symbol generator;

means for coupling said third and fourth control signals to said second 'hitting' symbol generator;

means for generating fifth and sixth control signals for said 'hit' symbol generator;

means for coupling said fifth and sixth control signals to said 'hit' symbol generator;

means for coupling said first, second, third and fourth control signals to said means for generating fifth and sixth control signals; and

means for coupling the outputs of said symbol generators and said sync signals to a television receiver."

For those models identified in response to interrogatory 17 which do not include the entire combination of elements recited

above, state with specificity which elements are not included in the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 45

45. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"Apparatus for generating symbols on the screen of a television receiver to be manipulated by at least one participant, comprising:

means for generating a 'hitting' symbol;

means for generating a movable 'hit' symbol;

means for generating a fixed 'hit' symbol;

means for denoting coincidence between said movable 'hit' symbol and said first 'hit' symbol;

means for causing said movable 'hit' symbol to move away from said fixed 'hit' symbol when coincident therewith; and

means for coupling said generated symbols to a television receiver."

For those models identified in response to interrogatory 17 which do not include the entire combination of elements recited above, state with specificity which elements are not included in the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 46

46. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"Apparatus for playing a target shooting game on the screen of a cathode ray tube, comprising:

means for generating a target on the screen of said cathode ray tube;

means responsive to said target displayed on said cathode ray tube for 'shooting' at said target;

means for causing said target to move in a predetermined direction;

means for causing said target to reverse direction upon hitting of said target by said means responsive,

means for causing said target to go off screen when not hit by said means responsive during a traverse across the screen."

For those models identified in response to interrogatory 17 which do not include the entire combination of elements recited above, state with specificity which elements are not included in the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

Interrogatory No. 47

47. State which of the models identified in response to interrogatory 17 include the following combination of elements:

"Apparatus for playing a target shooting game on the screen of a cathode ray tube, comprising:

means for generating a target on the screen of said cathode ray tube;

means responsive to said target displayed on said cathode ray tube for 'shooting' at said target from a distance, including a biased photosensitive element; and

means for causing said target to disappear when a hit is made."

For those models identified in response to interrogatory 17 which do not include the entire combination of elements recited above, state with specificity which elements are not included in the respective models.

ANSWER: The answer to this interrogatory is the same as to Interrogatory No. 35.

STATE OF ILLINOIS     )  
                              )     SS.  
COUNTY OF C O O K    )

I, Melvin M. Goldenberg, being duly sworn, do hereby state that the foregoing Answers to Plaintiffs' First Interrogatories to Defendant World Wide Distributors, Inc. Nos. 1 through 47 are provided by me on the basis of my personal knowledge and my information and belief based on information communicated to me by employees of World Wide Distributors, Inc.

Melvin M. Goldenberg  
Melvin M. Goldenberg

Subscribed and sworn to before me this 6th day of January, 1975.

Louise J. Donley  
Notary Public



CERTIFICATE OF SERVICE

This is to certify that one (1) copy of the foregoing ANSWERS ON BEHALF OF DEFENDANT WORLD WIDE DISTRIBUTORS, INC. TO PLAINTIFFS' FIRST INTERROGATORIES (NOS. 1 THROUGH 47) was served on plaintiffs' attorney, Theodore W. Anderson, Esq., Neuman, Williams, Anderson and Olson, 77 West Washington Street, Chicago, Illinois 60602, and defendants' attorneys, Donald L. Welsh, Esq., Fitch, Even, Tabin & Luedeka, 135 South LaSalle Street, Chicago, Illinois 60603, and Edward C. Threedy, Esq., Threedy & Threedy, 111 West Washington Street, Chicago, Illinois 60602, this 6<sup>th</sup> day of January, 1975, by first class mail, postage prepaid.

Melvin M. Goldenberg  
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